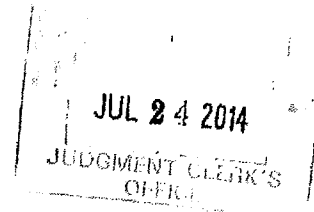


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Co-Lead Counsel for Plaintiff Classes



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

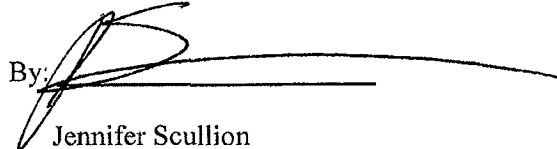
-----X		
SILVIA SEIJAS, et al,	:	04 Civ. 400 (TPG)
	:	
Plaintiffs,	:	
	:	
-against-	:	
	:	
THE REPUBLIC OF ARGENTINA,	:	
	:	
Defendant.	:	
-----X		
SILVIA SEIJAS, et al,	:	04 Civ. 401 (TPG)
	:	
Plaintiffs,	:	
	:	
-against-	:	
	:	
THE REPUBLIC OF ARGENTINA,	:	
	:	
Defendant.	:	
-----X		
CESAR RAUL CASTRO,	:	04 Civ. 506 (TPG)
	:	
Plaintiff,	:	
	:	
-against-	:	
	:	
THE REPUBLIC OF ARGENTINA,	:	
	:	
Defendant.	:	
-----X		
HICKORY SECURITIES LTD.,	:	04 Civ. 936 (TPG)
	:	
Plaintiff,	:	
	:	
-against-	:	
	:	
THE REPUBLIC OF ARGENTINA,	:	
	:	
Defendant.	:	
-----X		

**NOTICE OF SETTLEMENT OF
CLASS NOTICE AND OPT OUT PROCEDURE ORDER**

-----X		
ELIZABETH ANDREA AZZA, et al,	:	04 Civ. 937 (TPG)
Plaintiffs,	:	
-against-	:	
THE REPUBLIC OF ARGENTINA,	:	
Defendant.	:	
-----X		
ELIZABETH ANDREA AZZA, et al.,	:	04 Civ. 1085 (TPG)
Plaintiffs,	:	
-against-	:	
THE REPUBLIC OF ARGENTINA,	:	
Defendant.	:	
-----X		
EDUARDO PURICELLI,	:	04 Civ. 2117 (TPG)
Plaintiff,	:	
-against-	:	
THE REPUBLIC OF ARGENTINA,	:	
Defendant.	:	
-----X		
RUBEN DANIEL CHORNY,	:	04 Civ. 2118 (TPG)
Plaintiff,	:	
-against-	:	
THE REPUBLIC OF ARGENTINA,	:	
Defendant.	:	
----- x		

PLEASE TAKE NOTICE that, pursuant to Local Rule 77.1, an order in the form attached hereto will be presented to the Honorable Thomas P. Griesa, Judge of the United States District Court for the Southern District of New York, at the United States Courthouse, 500 Pearl Street, New York, New York, on August 4, 2014 at 10:00 o'clock a.m.

Dated: New York, New York
July 24, 2014

By: 

Jennifer Scullion
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Co-Lead Counsel for Plaintiffs

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(212) 225-2000
Attorneys for the Republic of Argentina

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	Defendant.	:	
		:	
-----X		:	
EDUARDO PURICELLI,		:	04 Civ. 2117 (TPG)
	Plaintiff,	:	
-against-		:	
		:	
THE REPUBLIC OF ARGENTINA,		:	
	Defendant.	:	
-----X		:	
RUBEN DANIEL CHORNY,		:	04 Civ. 2118 (TPG)
	Plaintiff,	:	
-against-		:	
		:	
THE REPUBLIC OF ARGENTINA,		:	
	Defendant.	:	
-----X		:	

**[proposed] ORDER WITH RESPECT TO
CLASS NOTICE AND OPT OUT PROCEDURE**

WHEREAS the Class Notes consist of the following bond series:

Seijas, No. 04-cv-400, US(040114AN0)2

Seijas, No. 04-cv-401, US(040114GF1)4

Castro, No. 04-cv-506, US(040114AV2)8

Hickory Securities Ltd., 04-cv-936, US(040114GA2)7

Azza, No. 04-cv-937, US(040114AZ3)2

Azza, No. 04-cv-1085, US(040114AH3)4

Puricelli, No. 04-cv-2117, US(040114GD6)5

Chorny, No. 04-cv-2118, XS(004312058)2

WHEREAS the Court certified classes in the above eight actions on August 10, 2005 and entered Order(s) With Respect to Notice concerning such classes on November 13, 2007;

WHEREAS the Court modified those classes in orders entered April 24, 2014 (the “Holder Classes”) and appointed Class Counsel for the Holder Classes; and

WHEREAS the Holder Classes consist of all owners of a beneficial interest (“Holders”) in any of the Class Notes, except as excluded pursuant to paragraph 2 of the April 24, 2014 Orders;

IT IS HEREBY ORDERED THAT:

1. The Court hereby approves the forms of Summary Notice and 2014 Notice of Pendency of Class Actions (the latter, the “2014 Notice”) in the forms attached hereto as Exhibits A and B, respectively (such forms to be conformed by Class Counsel with respect to each of the eight actions);
2. Class Counsel may, in its discretion, designate an administrator, who may assist in providing notice to the classes;
3. Within seven (7) calendar days of entry of this Order, Class Counsel shall cause the Summary Notices for each of the eight actions to be published once in each of La Nación and/or Clarín (Spanish version of Summary Notice) and Businesswire (English version of Summary Notice), such publication in each case to be on a weekday, and shall cause similar, subsequent publications within fourteen (14) calendar days after the initial publications;
4. Within seven (7) calendar days of entry of this Order, the Republic of Argentina shall cause the 2014 Notices for each of the eight actions to be posted to the official website of the Ministerio de Economía y Finanzas Públicas de la Nación (currently found at <http://www.mecon.gov.ar>) and shall thereafter maintain such postings until such time agreed to by the parties or ordered by the Court;

5. Within seven (7) calendar days of entry of this Order, the Republic of Argentina shall cause the 2014 Notices for each of the eight actions (a) to be submitted to DTC for posting and distribution through DTC's LENS (Legal Notice System) and (b) to be submitted to Euroclear (and any other clearing agents for the Class Notes) to be posted and distributed through the agents' similar legal notice or corporate action notice procedures;

6. Within thirty (30) calendar days of entry of this Order, Class Counsel shall cause a copy of the 2014 Notice for the relevant action(s) to be sent by first class U.S. mail postage prepaid to (a) each Holder of Class Notes identified in prior proceedings and (b) each Holder of Class Notes that responds to the Summary Notice or otherwise sends Class Counsel a written request for the 2014 Notice. Class Counsel shall also cause a copy of the 2014 Notice for the relevant action(s) to be sent by first class U.S. mail postage prepaid to any Holder of Class Notes that sends Class Counsel a written request received by Class Counsel before the Opt Out Deadline (set forth below);

7. The following Holders of Class Notes shall be excluded from the Holder Classes:

- a. Any Holder that timely submits a Request for Exclusion from Holder Class on or before the Opt Out Deadline, to the extent of the beneficial interests identified in the Request for Exclusion (and any subsequent transferee of such Holder's beneficial interests in the Class Notes, to the extent of such transferred interests);
- b. Any Holder that filed a separately pending lawsuit or arbitration on or before entry of the April 24, 2014 Orders, to the extent of the beneficial interests in the Class Notes asserted in such lawsuit or arbitration;

- c. Any Holder that has exchanged Class Notes for new bonds in either or both of the 2005 and 2010 exchange offers made by the Republic of Argentina, to the extent of the beneficial interests exchanged or otherwise extinguished.
- 8. The Opt Out Deadline shall be ninety (90) calendar days from entry of this Order.
- 9. Within sixty (60) calendar days of entry of this Order, the Republic of Argentina shall serve on Class Counsel:
 - a. A complete listing of all lawsuits and/or arbitrations that satisfy the requirements of Paragraph 7(b) above, including enumeration of the holders that have made the claims, the bond series and amount of the holdings claimed for each holder, and the current status of the claim, including the extent to which any holding on which a claim was made was later exchanged, transferred or extinguished.
 - b. Any update to the accounting previously provided by the Republic of Argentina with respect to the face value of Class Notes, by series, that were exchanged in either of the Republic's exchange offers or that have otherwise been extinguished.

DONE AND ORDERED in New York, New York, this ____ day of August, 2014.

Judge Thomas P. Griesa
United States District Judge

EXHIBIT A

[proposed] SUMMARY NOTICE OF CLASS ACTION

TO: ALL CURRENT HOLDERS OF REPUBLIC OF ARGENTINA [BOND DESCRIPTION]

The Court has certified a class with respect to the bonds described above. **If you currently own or hold a beneficial interest in these bonds, you might be part of the class and your rights might be affected. If you do not wish to be part of the class, you must submit a Request for Exclusion on or before [OPT OUT DEADLINE].** Details concerning the action, what it means to be a class member, how to determine whether you are part of the class, and the steps you must take if you do not want to be part of the class are available in the 2014 Notice of Pendency of Class Actions.

If you have not already received a copy of the 2014 Notice of Pendency of Class Actions concerning the modified classes, you may obtain it by writing to: Co-Lead Class Counsel, Jennifer Scullion, Proskauer Rose LLP, 11 Times Square, New York, NY 10031, telephone 212-969-3655, email jscullion@proskauer.com.

DO NOT CONTACT THE CLERK OR THE COURT FOR INFORMATION

Dated: August __, 2014

Judge Thomas P. Griesa
United States District Judge

[propuesta] NOTIFICACIÓN RESUMIDA DE UNA ACCIÓN COLECTIVA

PARA: TODOS LOS TENEDORES DE LA REPÚBLICA DE ARGENTINA [DESCRIPCIÓN DEL BONO]

El Juzgado ha certificado un grupo respecto de los bonos descritos supra. **Si es propietario o ejerce un derecho en beneficio propio respecto de estos bonos, podría ser parte de la acción colectiva y sus derechos podrían ser afectados. Si no desea ser parte de la demanda colectiva, deberá presentar una Solicitud de Exclusión en o antes de [OPT OUT DEADLINE].** Los detalles atinentes a la acción colectiva, qué significa ser parte del grupo certificado, cómo establecer si es parte del grupo certificado y los pasos que deberá tomar si no quiere ser parte de la acción colectiva, están disponibles en la Notificación de la Pendencia de Acciones Colectivas de 2014.

Si todavía no ha recibido una copia de la Notificación de la Pendencia de Acciones Colectivas de 2014 respecto de la modificación de grupos certificados, puede escribir a: Co-Lead Class Counsel, Jennifer Scullion, Proskauer Rose LLP, 11 Times Square, New York, NY 10031, Teléfono 212-969-3655; correo electrónico: jscullion@proskauer.com.

NO DIRIJA CONSULTAS DE INFORMACIÓN AL SECRETARIO DE JUZGADO

Fechado: ____ de agosto de 2014

Juez Thomas P. Griesa
Juez de Distrito de Estados Unidos

EXHIBIT B

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

2014 NOTICE OF PENDENCY OF CLASS ACTION**IF YOU CURRENTLY HOLD REPUBLIC OF ARGENTINA [BOND DESCRIPTION], A CLASS ACTION LAWSUIT MAY AFFECT YOUR RIGHTS.**

- Individual holders of these bonds sued the Republic of Argentina seeking to require Argentina to pay all unpaid principal and interest on the bonds.
- In 2005, the Court allowed the lawsuit to be a class action. Holders that bought or received these bonds after the lawsuit was filed were not part of the class.
- On April 24, 2014, the Court modified the class definition to include bonds that were bought or received after the lawsuit was filed in 2004.
- There is no money available now, and there is no guarantee that there will be money available later. However, your legal rights might be affected and you have a choice to make now:

YOUR LEGAL RIGHTS AND OPTIONS IN THIS LAWSUIT	
DO NOTHING	<p>Stay in this lawsuit. Await the outcome. Give up certain rights.</p> <p>By doing nothing, you keep your potential right to get money or other benefits that may come from a judgment or settlement. But you also give up your right to sue Argentina separately about the same legal claims in this lawsuit.</p>
ASK TO BE EXCLUDED	<p>Get out of this lawsuit. Get no benefits from it. Keep rights.</p> <p>If you file a request to be excluded before the Opt Out Deadline, you will not share in any money or benefits that may be recovered on a judgment or settlement. But, you will keep any right you have to sue Argentina separately about the same legal claims in this lawsuit.</p>

- Your options are explained in this Notice. **If you want to be excluded from the class, you must act before [OPT OUT DEADLINE].**
- If you separately sued or brought a claim on your bonds against Argentina before April 24, 2014, you are automatically excluded from the class and you do not need to make a written request for exclusion.

- If you exchanged your bonds for new bonds in the 2005 or 2010 Exchange Offers made by Argentina, you are automatically excluded from the class and you do not need to make a written request for exclusion.
- NOTE: If you buy or receive these bonds after [OPT OUT DEADLINE], you are bound by what happened before that date. You cannot opt out of the class if the bonds were held by a class member that was not excluded and you cannot join the class if the bonds were held by a class member that was excluded.

DO NOT CALL THE COURT OR THE CLERK OF THE COURT FOR INFORMATION OR ADVICE. IF YOU HAVE ANY QUESTIONS ABOUT THIS NOTICE, YOU MAY CONSULT A LAWYER OF YOUR OWN CHOOSING OR CONTACT CLASS COUNSEL.

BASIC INFORMATION

1. Why did I get this notice?

This notice is being sent to you because records show you held a certain type of bond issued by the Republic of Argentina (or you requested to receive this notice). The type of bond is [BOND DESCRIPTION AND CUSIP]. These are called the “Bonds.”

This notice explains that the Court has allowed, or “certified,” a class action lawsuit that may affect you with respect to these Bonds. You may have legal rights and options that you may exercise concerning the lawsuit. The lawsuit will decide whether Argentina owes money on these Bonds and whether Argentina is complying with the contract that governs these Bonds.

Judge Thomas P. Griesa of the United States District Court for the Southern District of New York is overseeing this lawsuit. The lawsuit is known as [CASE NAME AND CIVIL ACTION NUMBER].

2. What is this lawsuit about?

This lawsuit is about Argentina’s obligations to pay money on these Bonds and whether Argentina is complying with the contract that governs these Bonds.

3. What is a class action and who is involved?

In a class action lawsuit, one or more people called “Class Representatives” sue on behalf of other people who have similar claims. Here, the Class Representative[s] [is/are _____]. The Class Representative and all the people with similar claims are together called the “Class” or “Class Members.” They also are called the Plaintiffs. Argentina is called the Defendant. Once court resolves the issues for everyone in the Class, except people who are excluded from the class. This notice explains below who is excluded from the Class and what steps you need to take if you want to be excluded from the Class.

The Court also has ruled that certain lawyers will represent the Class as Class Counsel.

Class Counsel are:

Jennifer Scullion
PROSKAUER ROSE LLP
Eleven Times Square
New York, NY 10036
(212) 969-3000
jscullion@proskauer.com

Saul Roffe
Law Offices of Saul Roffe, Esq.
52 Homestead Circle
Marlboro, NJ 07746
(732) 375-9220
sroffe@gmail.com

Michael Diaz, Jr.
Carlos F. Gonzalez
Marta Colomar-Garcia
DIAZ REUS & TARG LLP
100 S.E. 2nd Street
Suite 3400
Miami, FL 33131
(305) 375-9220
mdiaz@diazreus.com
cgonzalez@diazreus.com
mcolomar@diazreus.com

4. Why is this lawsuit a class action?

The Court decided that this lawsuit can be a class action because it meets the requirements of Federal Rule of Civil Procedure 23, which governs class actions in federal courts. Specifically, the Court found that:

- There are numerous holders of these Bonds;
- There are legal questions and facts that are common to all of the bondholders;
- The common legal questions and facts are more important than questions that affect only individual Class Members;

- The Class Representative[s] claims are typical of the claims of the rest of the Class;
- The Class Representatives and the lawyers representing the Class will fairly and adequately represent the Class' interests; and
- This class action will be more efficient than having many individual lawsuits.

THE CLAIMS IN THIS LAWSUIT

5. What does the lawsuit complain about?

Plaintiffs say that Argentina has not paid principal and interest due and owing on these Bonds and that Argentina has not complied with the contract that governs these Bonds.

6. How has Argentina answered the complaint?

Argentina does not dispute that it owes money on these Bonds, but it disputes the total amount owed. Argentina also said it had certain legal defenses.

Argentina also has disputed whether this lawsuit should proceed as a class action. It has asked the Court of Appeals to overrule Judge Griesa's April 24, 2014 Order concerning the class definition. Plaintiffs will respond and ask the Court of Appeals to affirm Judge Griesa's Order.

7. Has the Court decided who is right?

The Court has decided that Argentina owes principal and interest on these Bonds. However, the Court has not decided the total amount owed to the Class Members.

8. What are the Plaintiffs asking for?

The Plaintiffs are asking for the full amount of principal and interest owed on the Bonds for all Class Members, as well as pre-judgment interest.

9. Is there any money available now?

No money or benefits are available now because the Court has not decided the total amount owed to the Class and there has been no settlement of the dispute. There is no guarantee that money or benefits will ever be obtained by judgment or settlement. If money or benefits are obtained, you will be notified about how to ask for a share.

WHO IS IN THE CLASS?

You need to decide whether you are affected by this lawsuit.

10. Am I part of this Class?

You are part of this Class if (a) you currently hold any amount of these Bonds and (b) you have not filed a separate lawsuit or arbitration claim to seek payment on that amount.

You can confirm whether you currently hold these Bonds by checking your current investment account statement or speaking with your investment advisor or the institution where you hold your investments.

If you filed a separate lawsuit or arbitration claim before April 24, 2014 to seek payment on these Bonds, you are not part of this Class.

If you held these Bonds, but exchanged them for new bonds in the 2005 or 2010 Exchange Offers made by Argentina, you are not part of this Class.

11. What if I bought or received these Bonds after [OPT OUT DATE]? Am I part of this Class?

If you buy or receive these bonds after [OPT OUT DEADLINE], you are bound by what happened before that date. You cannot opt out of the class if the bonds were held by a class member that was not excluded and you cannot join the class if the bonds were held by a class member that was excluded.

YOUR RIGHTS AND OPTIONS

If you are in the Class, You have to decide whether to stay in the Class or ask to be excluded.

You have to decide this now and take certain steps before **[OPT OUT DEADLINE]** if you want to be excluded.

12. What happens if I stay in the Class?

If you stay in the Class, you give up your right to bring a separate claim on these Bonds and you will be legally bound by what the Court decides in this lawsuit. You will be represented in this lawsuit by Class Counsel. You will not have to pay Class Counsel. However, Class Counsel may ask the Court to award them fees and expenses, which may be deducted from any money Class Counsel obtains for the Class by judgment or settlement.

13. Do I need to do anything if I want to stay in the Class?

If you want to stay in the Class, you do not need to do anything except retain ownership of these Bonds. Later in the lawsuit or as part of a settlement, you may be asked to submit information or documents to prove that you own these Bonds. If you sell or transfer these Bonds, you will no longer be a Class Member and you will not have a right to share in any recovery that may be obtained for the Class. The person or entity to which you sell or transfer the Bonds will take your place as a Class Member.

14. What happens if I ask to be excluded from the Class?

If you make a timely request to be excluded from the Class before the Opt Out Deadline explained below, you will not be a Class Member and you will not have a right to share in any recovery that may be obtained for the Class. You will not be represented by Class Counsel and you will not be legally bound by what the Court decides in this lawsuit. You will be entitled to file your own separate lawsuit or claim against Argentina, at your own cost.

15. How do I ask the Court to exclude me from the Class?

If you want to be excluded from the Class, you must send a “Request for Exclusion” in the form of a letter sent by mail to Class Counsel at the following address:

Jennifer Scullion
PROSKAUER ROSE
11 Times Square
New York, NY 10031

The Request for Exclusion must be post-marked by [OPT OUT DEADLINE].

The Request for Exclusion must include all of the following information:

- Your name.
- Your mailing address and phone number.
- A statement that you DO NOT want to be part of the Class.
- Which type of Bonds you hold (the series description, ISIN, or CUSIP number for the bonds) (You should be able to find this information on the account statement for your investment account or with the assistance of your investment advisor or the financial institution where you hold your Bonds.)
- The principal amount of the Bonds you hold.
- The name in which those Bonds are held (if the name is different from your own name, for example, if the Bonds are held by a family trust).

You must sign the Request for Exclusion.

If you WANT TO STAY IN THE CLASS, do not send a Request for Exclusion.

16. Do I have a lawyer in this lawsuit?

If you stay in the Class, you will be represented by Class Counsel. The Class Counsel are as follows:

Jennifer Scullion
PROSKAUER ROSE LLP
Eleven Times Square
New York, NY 10036
(212) 969-3000
jscullion@proskauer.com

Saul Roffe
Law Offices of Saul Roffe, Esq.
52 Homestead Circle
Marlboro, NJ 07746
(732) 375-9220
sroffe@gmail.com

Michael Diaz, Jr.
Carlos F. Gonzalez
Marta Colomar-Garcia
DIAZ REUS & TARG LLP
100 S.E. 2nd Street
Suite 3400
Miami, FL 33131
(305) 375-9220
mdiaz@diazreus.com
cgonzalez@diazreus.com
mcolomar@diazreus.com

17. Should I get my own lawyer?

If you stay in the Class, you do not need to hire your own lawyer because Class Counsel is working on your behalf. If you want your own lawyer, you can get one. For example, you can ask him or her to appear in Court for you if you want someone other than Class Counsel to speak for you. If you do get your own lawyer, you will have to pay for that lawyer yourself.

If you do not stay in the Class, Class Counsel will not represent you. For example, if you decide to bring a separate lawsuit against Argentina, you might want to hire your own lawyer to bring that lawsuit.

18. How will the lawyers be paid?

If Class Counsel get money or benefits for the Class (by judgment or settlement), they may ask the Court for fees and expenses. You will not have to pay those fees and expenses. If the Court grants Class Counsel's request, the fees and expenses either will be deducted from any money obtained for the Class or paid separately by Argentina.

19. Will I get money?

If the Plaintiffs obtain money or benefits as a result of a judgment or settlement in the lawsuit, you will be notified about that fact and also told what you need to do to share in the money or benefits. We do not know how long this will take.

If you sell or transfer your Bonds, you will no longer be a Class Member and you will not have a right to share in any money or benefits that may be obtained for the Class. The person or entity to which you sell or transfer the Bonds will take your place as a Class Member.

20. Are more details available?

If you want more details on the lawsuit, you can call or write to Class Counsel at the following contact:

Jennifer Scullion
PROSKAUER ROSE
11 Times Square
New York, NY 10031
jscullion@proskauer.com
(212) 969-3655

NOTICE TO BROKERS AND OTHER NOMINEES

The Court requests all banks, brokerage firms and other nominees for an owner of beneficial interests in the Bonds to forward this Notice promptly (and in no event later than seven (7) calendar days after receipt of this Notice) to all such owners of beneficial interests in

the Bonds. Additional copies of this Notice may be obtained by written request to Class Counsel at the above address. Class Counsel will pay all appropriate costs.

Dated: New York, New York
_____, 2014

CLERK
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CERTIFICATE OF SERVICE

I, the undersigned attorney for Plaintiffs, certify that on July 24, 2014, I caused to be served upon Carmine Boccuzzi, attorney for Defendant, of the law firm Cleary Gottlieb Steen & Hamilton LLP, by hand delivery to One Liberty Plaza, New York, NY 10006 true and correct copies of the following documents:

- Notice of Settlement, dated July 24, 2014; and
- Proposed Order with Respect to Class Notice and Opt Out Procedure.

Dated: July 24, 2014

By: 

Jennifer R. Scullion
PROSKAUER ROSE LLP
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jscullion@proskauer.com